UNITED STATES DISTRICT COURT DISTRICT OF RHODE ISLAND

NATIONAL LIABILITY & FIRE INSURANCE CO.

and

BOAT OWNERS ASSOCIATION OF THE

UNITED STATES

Plaintiffs,

٧.

NATHAN CARMAN

Defendant.

Civil Action No: 17-0038-S-PAS

In Admiralty

PLAINTIFFS' MOTION FOR PROTECTIVE ORDER

Plaintiffs National Liability & Fire Insurance Co. ("NLFIC") and Boat Owners of the United States ("BoatU.S.") move for a protective order on portions of Defendant's Fed. R. Civ. P. 30(b)(6) Deposition Notices to both Plaintiffs, pursuant to Fed. R. Civ. P. 26(b)(2)(C). A brief and declaration with exhibits are filed in support.

Fed. R. Civ. P. 37(a)(1) Certification

I certify I emailed Defendant's attorney January 29 and February 5, 2018 and we then spoke by telephone in a good faith effort to avoid filing this motion when I urged that we meet and confer, to no avail. After Defendant responds to this motion I will contact his attorney to meet and confer again.

RESPECTFULLY SUBMITTED February 6, 2018.

PLAINTIFFS

<u>/s/ David J. Farrell, Jr.</u> David J. Farrell, Jr. Pro Hac Vice

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/s/ Sean T. O'Leary
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Certificate of Service I certify this motion was efiled and served on Attys Anderson and Humphrey via the CM/ECF System 02/06/2018.

/s/ David J. Farrell, Jr.